

Exhibit 17

11:12



Steve >

iMessage

Mon, Mar 18 at 2:58 PM

Good afternoon, this is Cathy Ball. Do you have time for a quick call?

Delivered

Call me

From: "Emily Taylor" <etaylor@watsonroach.com>

To: [REDACTED]

Cc: "Watson, Blake" <bwatson@johnsoncitytn.org>, "Maria Ashburn" <mashburn@watsonroach.com>, "Reid Spaulding" <rspaulding@watsonroach.com>, "Lisa May" <lisa@hbm-lawfirm.com>

Subject: Doe v. City of Johnson City/Sean Williams

Date: Thu, 01 Feb 2024 17:52:01 +0000

Importance: Normal

Inline-Images: image001.png; image002.png; image003.png; image004.png

Ms. Kyte,

Blake Watson with Johnson City sent me your contact information and suggested that I reach out to you regarding a question I have for General Finney.

Erick Herrin and I are representing Johnson City in the Jane Doe lawsuit that was filed by some of Sean William's victims. We are working on responding to written discovery requests we have received from the Does' attorneys, and they have requested copies of all documents in the possession of JCPD regarding the Williams' investigation. It is my understanding that the investigation into Sean Williams is ongoing/active, and I believe your office is currently investigating some cases involving the Jane Does in my lawsuit. I wanted to see if General Finney could provide me with any guidance regarding what JCPD files can be produced without compromising the integrity of General Finney's investigation.

Can you have General Finney, or someone from his office, contact me? My email address is etaylor@watsonroach.com and my telephone number is 865-637-1700.

Thanks!

Emily

Emily C. Taylor

865-637-1700 (office)

865-525-2514 (fax)

etaylor@watsonroach.com



WATSON ROACH
ATTORNEYS AT LAW

Website

Bio

V-Card

Watson, Roach, Batson & Lauderback, P.L.C.
P. O. Box 131
Knoxville, Tennessee 37901-0131

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From: "Kimberly A. Hagy" [REDACTED]
To: "etaylor@watsonroach.com" <etaylor@watsonroach.com>
Cc: "Steven R. Finney" [REDACTED], "Blake Watson "
<bwatson@johnsoncitytn.org>, "Chrystie L. Kyte" [REDACTED]

Subject: Doe vs. City of Johnson City/Sean Williams

Date: Fri, 02 Feb 2024 19:34:28 +0000

Importance: Normal

Attachments: Letter_to_Emily_Taylor_(02-02-24).pdf

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Ms. Taylor,

In response to your email of February 1st to Chrystie Kyte in our office, please see the attached letter from General Finney regarding Doe vs. City of Johnson City/Sean Williams.

Thank you,
Kim Hagy

Kim Hagy

Legal Assistant

District Attorney General's Office – 1st Judicial District

115 East Jackson Boulevard

P. O. Box 38

Jonesborough, TN 37659
[REDACTED]

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Jonesborough, TN 37659
(423) 753- 5020 office
(423) 753- 4803 fax

☐ Carter County Office
1500 West Elk Avenue
Suite 208
Elizabethton, TN 37643
(423) 547-5897 office
(423) 547- 5896 fax



STEVEN R. FINNEY
District Attorney General
First Judicial District

☐ Unicoi County Office
Unicoi County Courthouse
100 N. Main Street
P.O. Box 730
Erwin, TN 37650
(423) 743- 1113 office
(423- 743- 1120 fax

☐ Johnson County Office
301 West Main Street
Mountain City, TN 37683
(423) 727- 3959 office
(423) 727- 3965 fax

February 2, 2024

VIA ELECTRONIC MAIL

Ms. Emily C. Taylor
Watson, Roach, Batson & Lauderback
Attorneys at Law
P. O. Box 131
Knoxville, TN 37901-0131

RE: Doe vs. City of Johnson City/Sean Williams

Dear Ms. Taylor:

I am in receipt of your e-mail of February 1, 2024 inquiring as to the status of cases being investigated by the First Judicial District Attorney General's Office pertaining to Sean Williams.

As of today's date, all cases that originated in Johnson City are still being investigated and are active. Therefore, it is my opinion that the only documents that are subject to discovery are public records. Any other documents, recordings or physical evidence are not discoverable as this could impede the status of active criminal cases.

Sincerely,

Steven R. Finney
District Attorney General

SRF/kh

From: "Chrystie L. Kyte" [REDACTED]

To: Emily Taylor <etaylor@watsonroach.com>

Cc: Maria Ashburn <mashburn@watsonroach.com>, "Barry P. Staubus"

[REDACTED], Michael Stahl <Michael.Stahl@ag.tn.gov>, "Michael T. Little"
[REDACTED], "Kimberly A. Hagy" [REDACTED]

Subject: Jane Doe 1 et al v. City of Johnson City, Tennessee; et al. U.S. District Court Case No. 2:23-cv-00071-TRM-CRW

Date: Mon, 18 Mar 2024 15:21:24 +0000

Importance: Normal

Attachments: Emily_Taylor_Letter_03.18.2024.pdf

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Good morning,

General Finney asked that I forward the attached correspondence concerning Jane Doe 1 et al v. City of Johnson City, Tennessee. Please let me know if you have any questions.

Chrystie Kyte
Administrative Assistant
First Judicial District Attorney General's Office
P.O. Box 38
Jonesborough, TN 37659
[REDACTED]

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Reply to:

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Fax: (423) 753-4803

☐ Carter County Office
1500 West Elk Avenue, Suite 208
Elizabethton, TN 37643
Phone: (423) 547-5897
Fax: (423) 547-5896



STEVEN R. FINNEY
DISTRICT ATTORNEY GENERAL
FIRST JUDICIAL DISTRICT

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☐ Johnson County Office
301 West Main Street
Mountain City, TN 37683
Phone: (423) 727-3959
Fax: (423) 727-3965

March 18, 2024

VIA E-MAIL

Emily C. Taylor
Watson Roach Attorneys at Law
P.O. Box 131
Knoxville, TN 37901-0131
Email: etaylor@watsonroach.com

RE: Jane Doe 1 et al v. City of Johnson City, Tennessee; et al.
U.S. District Court No. 2:23-cv-00071-TRM-CRW

Dear Ms. Taylor:

In regards to your letter of March 8, 2004, in specific, Johnson City Police Department Case No. W21014774, my office has identified the victim and the accused. As a result of a conflict with my office, this case was referred to the Tennessee Bureau of Investigation and Barry Staubus, District Attorney General of the Second Judicial District.

All correspondences and requests concerning the above-referenced matter will need to go through General Staubus' office.

Sincerely,

Steve Finney
District Attorney General
First Judicial District

cc: Barry Staubus, District Attorney General, Second Judicial District
Michael Stahl, Senior Assistant Attorney General

From: Maria Ashburn <mashburn@watsonroach.com>

To: [REDACTED]

Cc: [REDACTED],

"michael.stahl@ag.tn.gov" <michael.stahl@ag.tn.gov>, Lisa May <lisa@hbm-lawfirm.com>, Jon Lakey <jlakey@bpjlaw.com>, Emily Taylor <etaylor@watsonroach.com>

Subject: Jane Doe 1, et al. v. City of Johnson City, Tennessee, et al.

Date: Tue, 27 Feb 2024 21:04:31 +0000

Importance: Normal

Attachments: 2024-02-27_Letter_from_Emily_Taylor.pdf

Inline-Images: image001.png; image002.png; image003.png

General Finney:

Please see the attached letter from Emily Taylor. Ms. Taylor will look forward to hearing back from you in this regard.

Thank you for your attention to this matter.

Sincerely,

Maria Ashburn

Assistant to Hanson R. Tipton and Emily C. Taylor

865-637-1700 (office)

865-525-2514 (fax)

mashburn@watsonroach.com



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Knoxville, Tennessee 37901-0131

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John T. Batson, Jr.
Benjamin K. Lauderback
Hanson R. Tipton
Reid A. Spaulding*
Dan R. Pilkington
Emily C. Taylor
Courtney E. Read
Brian R. Bibb
Cliff B. Robins+



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www.watsonroach.com

Robert H. Watson, Jr. (1945-2014)
Jon G. Roach, Of Counsel

Also Member:

* Illinois Bar
+ Ohio Bar

February 27, 2024

VIA E-MAIL

Steven R. Finney
District Attorney General
First Judicial District
115 W. Jackson Boulevard
Jonesborough, TN 37659

Re: Jane Doe 1 et al. v. City of Johnson City, Tennessee; et al.
U.S. District Court No. 2:23-cv-00071-TRM-CRW

Dear General Finney:

Pursuant to the instructions from Senior Assistant Attorney General Michael Stahl, I am writing you regarding which documents or materials may be relevant to the ongoing investigation into Sean Williams so that I can respond to written discovery requests propounded on the City of Johnson City by the Plaintiffs in the above-captioned matter. First, we intend to produce redacted case notes for all sexual assault investigations conducted by the JCPD from January 1, 2018 through December 31, 2022. It is my understanding that included with the case notes are case notes involving sexual assaults involving Williams that JCPD investigated. However, both victim and suspect names will be redacted from these records. Please let me know if your office has any objection to me providing the redacted case notes to the Does' attorneys as part of the City's discovery responses. If you would like to see the case notes before they are produced, I can provide you with a copy.

Additional documents sought through discovery in this case relate to the investigation initiated after FEMALE 3 fell out of Sean Williams's window. Can you please advise what, if any, documents from the FEMALE 3 investigation are relevant to your ongoing investigation into Williams? It is unclear to me whether there is a pending investigation involving Ms. FEMALE 3, and if so, what documents are pertinent to that investigation.


Another category of documents sought through discovery in the Doe litigation are emails and text messages sent or received by JCPD officers involving sexual assault investigations, FEMALE 3 case, and Sean Williams. Can you advise as to if these electronic communications

are relevant to your ongoing investigations and/or if we are prohibited from producing the information?

Finally, it is my understanding that certain sexual assault investigative files that had previously been closed by JCPD have been reopened by your office. These files include suspects other than Sean Williams. Some of these investigative materials are being sought as discovery in the above-captioned matter. Would it be possible for you to let us know which previously closed files your office has reopened so that we can determine which of the documents requested involve pending investigations. Once we have that information, I will coordinate with you regarding which documents may be relevant to your ongoing investigation.

As always, thank you for your assistance in this matter.

Very truly yours,



Emily C. Taylor

cc: Michael M. Stahl (via e-mail)
K. Erickson Herrin (via e-mail)
Jon Lakey (via e-mail)

From: Maria Ashburn <mashburn@watsonroach.com>

To: [REDACTED]

Cc: "Chrystie L. Kyte" [REDACTED], "Kimberly A. Hagy" [REDACTED],
"michael.stahl@ag.tn.gov" <michael.stahl@ag.tn.gov>, Lisa May <lisa@hbm-
lawfirm.com>, Jon Lakey <jlakey@bpjlaw.com>, Emily Taylor
<etaylor@watsonroach.com>

Subject: Jane Doe 1, et al. v. City of Johnson City

Date: Thu, 14 Mar 2024 19:36:33 +0000

Importance: High

Attachments: 2024-03-14_Letter_from_Emily_Taylor.pdf; 2024-03-
12_(Doc_128)_Memo_and_Order_denying_Motion_for_Protective_Order.pdf

Inline-Images: image001.png; image002.png; image003.png

General Finney:

Attached please find Emily Taylor's letter and a recent Memorandum Opinion issued by United States Magistrate Judge Jill E. McCook. Ms. Taylor will look forward to hearing from you in this regard.

Thank you for your attention to this matter.

Sincerely,

Maria Ashburn

Assistant to Hanson R. Tipton and Emily C. Taylor

865-637-1700 (office)

865-525-2514 (fax)

mashburn@watsonroach.com



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Benjamin K. Lauderback
Hanson R. Tipton
Reid A. Spaulding*
Dan R. Pilkington
Emily C. Taylor
Courtney E. Read
Brian R. Bibb
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Robert H. Watson, Jr. (1945-2014)
Jon G. Roach, Of Counsel

Also Member:
* Illinois Bar
+ Ohio Bar

March 14, 2024

VIA E-MAIL

Steven R. Finney
District Attorney General
First Judicial District
115 W. Jackson Boulevard
Jonesborough, TN 37659

Re: Jane Doe 1 et al. v. City of Johnson City, Tennessee; et al.
U.S. District Court No. 2:23-cv-00071-TRM-CRW

Dear General Finney:

Enclosed you will find a copy of an Order that was issued on Tuesday by Magistrate Judge McCook in the above-captioned matter. This Order pertains to the disclosure of investigative files and materials reviewed by Eric Daigle when he conducted his audit of the JCPD from August of 2022 through July of 2023. Mr. Daigle received and reviewed investigative materials for approximately 325 sexual assault files. These files include cases involving Sean Williams and potentially other cases that your office has reopened and/or are being investigated by your office.

Magistrate Judge McCook has ordered Daigle and the City to release both the investigative files reviewed by Daigle and his work product by Tuesday March 19, 2024. You have indicated that you believe there is an investigative privilege as to some of the investigative materials. However, it appears that your office is the holder of that privilege. Please let us know by the close of business tomorrow if you intend to file a motion with the Court asserting that privilege. If we do not hear from you, we will proceed with producing the documents consistent with the Court's Order.

As always, thank you for your assistance in this matter.

Very truly yours,



Emily C. Taylor

ECT

Enclosure

cc: Michael M. Stahl (via e-mail)
K. Erickson Herrin (via e-mail)
Jon Lakey (via e-mail)

From: Maria Ashburn <mashburn@watsonroach.com>

To: [REDACTED]

Cc: [REDACTED],

Emily Taylor <etaylor@watsonroach.com>

Subject: RE: Doe vs. City of Johnson City/Sean Williams

Date: Wed, 14 Feb 2024 21:55:07 +0000

Importance: Normal

Attachments: 2024-02-14_Letter_from_Emily_Taylor.pdf

Inline-Images: image001.png; image002.png; image003.png

General Finney:

Please see the attached letter from Emily Taylor in reply to your letter of February 2, 2024. Ms. Taylor will look forward to hearing back from you.

Thank you for your attention to this matter.

Sincerely,

Maria Ashburn

Assistant to Hanson R. Tipton and Emily C. Taylor

865-637-1700 (office)

865-525-2514 (fax)

mashburn@watsonroach.com



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From: Kimberly A. Hagy [REDACTED] >

Sent: Friday, February 2, 2024 2:34 PM

To: Emily Taylor <etaylor@watsonroach.com>

Cc: Steven R. Finney [REDACTED] >; Blake Watson <bwatson@johnsoncitytn.org>; Chrystie L. Kyte [REDACTED]

Subject: Doe vs. City of Johnson City/Sean Williams

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Ms. Taylor,

In response to your email of February 1st to Chrystie Kyte in our office, please see the attached letter from General Finney regarding Doe vs. City of Johnson City/Sean Williams.

Thank you,
Kim Hagy

Kim Hagy

Legal Assistant

District Attorney General's Office 1st Judicial District

115 East Jackson Boulevard

P. O. Box 38

Jonesborough, TN 37659

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Robert H. Watson, Jr. (1945-2014)
Jon G. Roach, Of Counsel

Also Member:

* Illinois Bar
+ Ohio Bar

February 14, 2024

VIA E-MAIL

Steven R. Finney
District Attorney General
First Judicial District
115 W. Jackson Boulevard
Jonesborough, TN 37659

Re: Jane Doe 1 et al. v. City of Johnson City, Tennessee; et al.
U.S. District Court No. 2:23-cv-00071-TRM-CRW

Dear General Finney:

Thank you for your letter dated February 2, 2024, regarding the status of cases being investigated by your office. It is my understanding that there are a number of cases pending against Sean Williams; however, my client does not have a list or otherwise have access to information that would help us determine what cases your office is investigating. If possible, can you provide us with a list of the pending cases involving Sean Williams that your office is investigating? That will help us determine which records may be discoverable.

Additionally, we are reviewing our records to see if there are any documents that may be considered "public" as referenced in your letter. Do you have any further guidance on what you would consider a "public document."

Thank you for your assistance in this matter.

Very truly yours,

Emily C. Taylor

ECT:mva

From: "Chrystie L. Kyte" [REDACTED] >
To: Maria Ashburn <mashburn@watsonroach.com>, "Steven R. Finney" [REDACTED]
Cc: "Kimberly A. Hagy" [REDACTED], "michael.stahl@ag.tn.gov" <michael.stahl@ag.tn.gov>, Lisa May <lisa@hbm-lawfirm.com>, Jon Lakey <jlakey@bpjlaw.com>, Emily Taylor <etaylor@watsonroach.com>
Subject: RE: Jane Doe 1, et al. v. City of Johnson City, Tennessee, et al.
Date: Wed, 28 Feb 2024 15:21:07 +0000
Importance: Normal
Inline-Images: image001.png; image002.png; image003.png

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Good morning,

General Finney asked that I respond on his behalf and thank you for sending this correspondence. General Finney stated that he will confer with General Stahl on this matter.

Chrystie Kyte
Administrative Assistant
First Judicial District Attorney General's Office
P.O. Box 38
Jonesborough, TN 37659
[REDACTED]

From: Maria Ashburn <mashburn@watsonroach.com>
Sent: Tuesday, February 27, 2024 4:05 PM
To: Steven R. Finney [REDACTED] >
Cc: Kimberly A. Hagy [REDACTED]; Chrystie L. Kyte [REDACTED]; michael.stahl@ag.tn.gov; Lisa May <lisa@hbm-lawfirm.com>; Jon Lakey <jlakey@bpjlaw.com>; Emily Taylor <etaylor@watsonroach.com>
Subject: Jane Doe 1, et al. v. City of Johnson City, Tennessee, et al.

General Finney:

Please see the attached letter from Emily Taylor. Ms. Taylor will look forward to hearing back from you in this regard.

Thank you for your attention to this matter.

Sincerely,
Maria Ashburn
Assistant to Hanson R. Tipton and Emily C. Taylor
865-637-1700 (office)
865-525-2514 (fax)
mashburn@watsonroach.com



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From: "Emily Taylor" <etaylor@watsonroach.com>

To: "Chrystie L. Kyte" [REDACTED], "Maria Ashburn" <mashburn@watsonroach.com>, "Steven R. Finney" [REDACTED]

Cc: "Kimberly A. Hagy" [REDACTED], "michael.stahl@ag.tn.gov" <michael.stahl@ag.tn.gov>, "Lisa May" <lisa@hbm-lawfirm.com>, "Jon Lakey" <jlakey@bpjlaw.com>

Subject: RE: Jane Doe 1, et al. v. City of Johnson City, Tennessee, et al.

Date: Wed, 06 Mar 2024 17:08:35 +0000

Importance: Normal

Inline-Images: image001.png; image002.png; image003.png

Ms. Kyte,

I am following up to see if you had heard from General Finney or General Stahl about my letter? Thanks for your assistance with this!

Emily

From: Chrystie L. Kyte [REDACTED]

Sent: Wednesday, February 28, 2024 10:21 AM

To: Maria Ashburn <mashburn@watsonroach.com>; Steven R. Finney [REDACTED]

Cc: Kimberly A. Hagy [REDACTED]; michael.stahl@ag.tn.gov; Lisa May <lisa@hbm-lawfirm.com>; Jon Lakey <jlakey@bpjlaw.com>; Emily Taylor <etaylor@watsonroach.com>

Subject: RE: Jane Doe 1, et al. v. City of Johnson City, Tennessee, et al.

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Good morning,

General Finney asked that I respond on his behalf and thank you for sending this correspondence. General Finney stated that he will confer with General Stahl on this matter.

Chrystie Kyte
Administrative Assistant
First Judicial District Attorney General's Office
P.O. Box 38
Jonesborough, TN 37659
[REDACTED]

From: Maria Ashburn <mashburn@watsonroach.com>

Sent: Tuesday, February 27, 2024 4:05 PM

To: Steven R. Finney [REDACTED]

Cc: Kimberly A. Hagy [REDACTED]; Chrystie L. Kyte [REDACTED]; michael.stahl@ag.tn.gov; Lisa May <lisa@hbm-lawfirm.com>; Jon Lakey <jlakey@bpjlaw.com>; Emily Taylor <etaylor@watsonroach.com>

Subject: Jane Doe 1, et al. v. City of Johnson City, Tennessee, et al.

General Finney:

Please see the attached letter from Emily Taylor. Ms. Taylor will look forward to hearing back from you in this regard.

Thank you for your attention to this matter.

Sincerely,

Maria Ashburn

Assistant to Hanson R. Tipton and Emily C. Taylor

865-637-1700 (office)

865-525-2514 (fax)

mashburn@watsonroach.com



Website

V-Card

Watson, Roach, Batson & Lauderback, P.L.C.

P. O. Box 131

Knoxville, Tennessee 37901-0131

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From: "Chrystie L. Kyte" [REDACTED]
To: Emily Taylor <etaylor@watsonroach.com>
Cc: "Kimberly A. Hagy" [REDACTED], "michael.stahl@ag.tn.gov" <michael.stahl@ag.tn.gov>
Subject: RE: Jane Doe 1, et al. v. City of Johnson City, Tennessee, et al.
Date: Thu, 07 Mar 2024 18:24:05 +0000
Importance: Normal
Attachments: 20240307131949.pdf
Inline-Images: image001.png; image002.png; image003.png

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Ms. Taylor,

General Finney asked that I forward this email and the attached correspondence on his behalf. After corroborating with Michael Stahl, Senior Assistant Attorney General, concerning your letter dated February 27, 2024, the attached serves as General Finney's response.

Chrystie Kyte
Administrative Assistant
First Judicial District Attorney General's Office
P.O. Box 38
Jonesborough, TN 37659
[REDACTED]

From: Emily Taylor <etaylor@watsonroach.com>
Sent: Wednesday, March 6, 2024 12:09 PM
To: Chrystie L. Kyte [REDACTED]; Maria Ashburn <mashburn@watsonroach.com>; Steven R. Finney [REDACTED]
Cc: Kimberly A. Hagy [REDACTED]; michael.stahl@ag.tn.gov; Lisa May <lisa@hbm-lawfirm.com>; Jon Lakey <jlakey@bpjlaw.com>
Subject: RE: Jane Doe 1, et al. v. City of Johnson City, Tennessee, et al.

Ms. Kyte,

I am following up to see if you had heard from General Finney or General Stahl about my letter? Thanks for your assistance with this!

Emily

From: Chrystie L. Kyte [REDACTED]
Sent: Wednesday, February 28, 2024 10:21 AM
To: Maria Ashburn <mashburn@watsonroach.com>; Steven R. Finney [REDACTED]
Cc: Kimberly A. Hagy [REDACTED]; michael.stahl@ag.tn.gov; Lisa May <lisa@hbm-lawfirm.com>; Jon Lakey <jlakey@bpjlaw.com>; Emily Taylor <etaylor@watsonroach.com>
Subject: RE: Jane Doe 1, et al. v. City of Johnson City, Tennessee, et al.

Good morning,

General Finney asked that I respond on his behalf and thank you for sending this correspondence. General Finney stated that he will confer with General Stahl on this matter.

Chrystie Kyte
Administrative Assistant
First Judicial District Attorney General's Office
P.O. Box 38
Jonesborough, TN 37659
[REDACTED]

From: Maria Ashburn <mashburn@watsonroach.com>
Sent: Tuesday, February 27, 2024 4:05 PM
To: Steven R. Finney [REDACTED]
Cc: Kimberly A. Hagy [REDACTED]; Chrystie L. Kyte [REDACTED]; michael.stahl@ag.tn.gov; Lisa May <lisa@hbm-lawfirm.com>; Jon Lakey <jlakey@bpjlaw.com>; Emily Taylor <etaylor@watsonroach.com>
Subject: Jane Doe 1, et al. v. City of Johnson City, Tennessee, et al.

General Finney:

Please see the attached letter from Emily Taylor. Ms. Taylor will look forward to hearing back from you in this regard.

Thank you for your attention to this matter.

Sincerely,

Maria Ashburn

Assistant to Hanson R. Tipton and Emily C. Taylor
865-637-1700 (office)
865-525-2514 (fax)
mashburn@watsonroach.com



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Jonesborough, TN 37659
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Fax: (423) 753-4803

☐ Carter County Office
1500 West Elk Avenue, Suite 208
Elizabethton, TN 37643
Phone: (423) 547-5897
Fax: (423) 547-5896



STEVEN R. FINNEY
DISTRICT ATTORNEY GENERAL
FIRST JUDICIAL DISTRICT

☐ Unicoi County Office
Unicoi County Courthouse
100 N. Main Street
P.O. Box 730
Erwin, TN 37650
Phone: (423) 743-1113
Fax: (423) 743-1120

☐ Johnson County Office
301 West Main Street
Mountain City, TN 37683
Phone: (423) 727-3959
Fax: (423) 727-3965

March 7, 2024

Emily C. Taylor
WATSON, ROACH, BATSON & LAUDERBACK, PLC
P.O. Box 131
Knoxville, TN 37901

RE: Jane Doe 1 et al. v. City of Johnson City, Tennessee, et al.
U.S. District Court No. 2:23-cv-00071-TRM-CRW

Dear Mrs. Taylor,

The First Judicial District Attorney General's Office is in receipt of your request for additional guidance regarding the release of documents requested by parties involved in the matter of *Jane Doe 1 et al. v. City of Johnson City, Tennessee, et al.*, U.S. District Court No. 2:23-cv-00071-TRM-CRW. Specifically, "whether there is a pending investigation involving **FEMALE 3** **FEMALE 3** and if so, what documents are pertinent to that investigation;" whether "electronic communications [sent or received by JCPD officers involving **FEMALE 3** case] are relevant to [that ongoing investigation];" and which sexual assault investigative files have been reopened, thereby constituting "pending investigations" for the purposes of discovery in the above styled matter?

Please be advised that there is a pending investigation involving **FEMALE 3** and, therefore, any request(s) for documents or materials relevant to the ongoing investigation of Ms. **FEMALE 3** are privileged under Tenn. R. Crim. P. 16, made applicable through Tenn. R. Civ. P. 26.02, *Tennessee v. Metropolitan Gov't of Nashville*, 485 S.W.3d 857, 870-71 (Tenn. 2016) (disclosure of criminal investigative records regarding a pending prosecution is dictated by Tenn. R. Crim. P. 16), and *State v. Harrison*, 270 S.W.3d 21, 35 (Tenn. 2008) (rules of criminal procedure can apply in civil contexts where the Tennessee Rules of Civil Procedure do not adequately balance the rights and interests of persons who are being prosecuted for criminal offenses). Moreover, any electronic communication sent or received by JCPD officers involving Ms. **FEMALE 3** case are similarly protected. Finally, to the extent the First Judicial District Attorney's Office has reopened certain sexual assault investigative files which might prohibit the release of documents pursuant to Rule 16, please provide the names of suspects other than Sean Williams which have been requested by

parties involved in the *Jane Doe* matter so that my office can instruct on the pending, or closed, status of those cases.

For any further questions or concerns regarding this matter please feel free to reach out to Chrystie Kyte at [REDACTED].

Sincerely,



STEVE FINNEY
District Attorney General
First Judicial District of TN

From: Maria Ashburn <mashburn@watsonroach.com>

To: "Steven R. Finney" [REDACTED]

Cc: "Chrystie L. Kyte" [REDACTED], "Kimberly A. Hagy" [REDACTED],
"michael.stahl@ag.tn.gov" <michael.stahl@ag.tn.gov>, Lisa May <lisa@hbm-lawfirm.com>, Jon Lakey <jlakey@bpjlaw.com>, Emily Taylor
<etaylor@watsonroach.com>

Subject: RE: Jane Doe 1, et al. v. City of Johnson City, Tennessee, et al.

Date: Fri, 08 Mar 2024 21:03:11 +0000

Importance: Normal

Attachments: 2024-03-08_Letter_from_Emily_Taylor.pdf; Redacted_Case_Notes_Example.pdf

Inline-Images: image001.png; image002.png; image003.png

General Finney:

Attached please find Emily Taylor's correspondence with accompanying enclosure for your review. Ms. Taylor will look forward to hearing from you in this regard.

Thank you for your attention to this matter.

Sincerely,

Maria Ashburn

Assistant to Hanson R. Tipton and Emily C. Taylor

865-637-1700 (office)

865-525-2514 (fax)

mashburn@watsonroach.com



Website

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From: Chrystie L. Kyte [REDACTED]

Sent: Wednesday, February 28, 2024 10:21 AM

To: Maria Ashburn <mashburn@watsonroach.com>; Steven R. Finney [REDACTED]

Cc: Kimberly A. Hagy [REDACTED]; michael.stahl@ag.tn.gov; Lisa May <lisa@hbm-lawfirm.com>; Jon Lakey

<jlakey@bpjlaw.com>; Emily Taylor <etaylor@watsonroach.com>

Subject: RE: Jane Doe 1, et al. v. City of Johnson City, Tennessee, et al.

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Chrystie Kyte
Administrative Assistant
First Judicial District Attorney General's Office
P.O. Box 38
Jonesborough, TN 37659
[REDACTED]

From: Maria Ashburn <mashburn@watsonroach.com>

Sent: Tuesday, February 27, 2024 4:05 PM

To: Steven R. Finney [REDACTED]

Cc: Kimberly A. Hagy [REDACTED]; Chrystie L. Kyte [REDACTED]; michael.stahl@ag.tn.gov; Lisa May <lisa@hbm-lawfirm.com>; Jon Lakey <jlakey@bpjlaw.com>; Emily Taylor <etaylor@watsonroach.com>

Subject: Jane Doe 1, et al. v. City of Johnson City, Tennessee, et al.

General Finney:

Please see the attached letter from Emily Taylor. Ms. Taylor will look forward to hearing back from you in this regard.

Thank you for your attention to this matter.

Sincerely,

Maria Ashburn

Assistant to Hanson R. Tipton and Emily C. Taylor

865-637-1700 (office)

865-525-2514 (fax)

mashburn@watsonroach.com



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From: "Chrystie L. Kyte" [REDACTED]
To: "Ball, Cathy" <cball@johnsoncitytn.org>, "Steven R. Finney" [REDACTED]
Cc: "Church, Bill" <bchurch@johnsoncitytn.org>, "Jenkins, Scott" <sjenkins@johnsoncitytn.org>, "Dougherty, Eric" <edougherty@johnsoncitytn.org>, "Shoun, Keisha" <kshoun@johnsoncitytn.org>
Subject: [EXTERNAL] RE: Media Heads Up
Date: Thu, 22 Jun 2023 18:33:23 +0000
Importance: Normal

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Ms. Ball,

General Finney's response concerning your media release, "Because this release directly pertains to the pending lawsuit, the line from your statement of "and we will continue to work hand in hand with the District Attorney's office to do so," needs to be omitted from your statement.

Please let me know if you have any questions. Thank you.

Chrystie Kyte
Administrative Assistant
First Judicial District Attorney General's Office
P.O. Box 38
Jonesborough, TN 37659
[REDACTED]

From: Ball, Cathy <cball@johnsoncitytn.org>
Sent: Thursday, June 22, 2023 2:05 PM
To: Steven R. Finney [REDACTED]
Cc: Church, Bill <bchurch@johnsoncitytn.org>; Jenkins, Scott <sjenkins@johnsoncitytn.org>; Dougherty, Eric <edougherty@johnsoncitytn.org>; Shoun, Keisha <kshoun@johnsoncitytn.org>
Subject: Media Heads Up

General Finney,

We are giving a media briefing at 3:00 PM today. I wanted to provide you with a copy of what I am planning to say. Please let me know if you have any questions.

My best,
Cathy

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From: "Kimberly A. Hagy" [REDACTED]

To: "Church, Bill" <bchurch@johnsoncitytn.org>

Cc: "Ball, Cathy" <cball@johnsoncitytn.org>, "christopher.wilhoit@tn.gov" <christopher.wilhoit@tn.gov>

Subject: [EXTERNAL] Sean Williams Investigation

Date: Tue, 27 Jun 2023 19:42:46 +0000

Importance: Normal

Attachments: Letter_to_JCPD_Chief_Church_(06-27-23).pdf

****CAUTION: External Email**** This email originated from outside of Johnson City's e-mail servers. DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Chief Church,

Please see the attached letter from General Finney regarding the Sean Williams' investigation. At General Finney's request, I am also providing a copy of this letter to Ms. Ball and Agent Wilhoit. Should you have any questions, please feel free to contact General Finney.

Thank you,
Kim Hagy

Kim Hagy

Legal Secretary

District Attorney General's Office – 1st Judicial District

115 East Jackson Boulevard

P. O. Box 38

Jonesborough, TN 37659
[REDACTED]

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Fax: (423) 753-4803

☐ Carter County Office
1500 West Elk Avenue, Suite 208
Elizabethton, TN 37643
Phone: (423) 547-5897
Fax: (423) 547-5896



STEVEN R. FINNEY
DISTRICT ATTORNEY GENERAL
FIRST JUDICIAL DISTRICT

☐ Unicoi County Office
Unicoi County Courthouse
100 N. Main Street
P.O. Box 730
Erwin, TN 37650
Phone: (423) 743-1113
Fax: (423) 743-1120

☐ Johnson County Office
301 West Main Street
Mountain City, TN 37683
Phone: (423) 727-3959
Fax: (423) 727-3965

June 27, 2023

VIA ELECTRONIC MAIL

Mr. Billy Church, Chief
Johnson City Police Department
601 East Main Street
Johnson City, TN 37601

RE: Investigation of Sean Williams

Dear Chief Church:

On June 2, 2023, I along with Abby Wallace, Assistant District Attorney, and Mike Little, D.A. Investigator, met with you, Eric Dougherty, Mike Adams, Cathy Ball, City Manager, and discussed the Williams' Investigation as to new evidence that was discovered as a result of the North Carolina investigation. Without going into detail, we described the magnitude of the situation. The crux of the conversation was that we wished to have a female investigator assist my office in interviews with potential victims if we could get them to come forward.

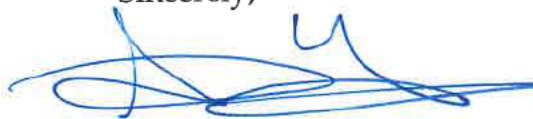
Since that time, there has been a second lawsuit filed naming more members of the Johnson City Police Department as "John Doe" defendants. As a result, I called you on June 23, 2023 and informed you that my office would be taking over the state investigation and using a TBI female agent to work with Mike Little in interviewing female victims and witnesses. I further informed you that this was my decision not to use the Johnson City Police Department to protect the sanctity of the investigation and prosecution. I explained that if the Johnson City Police Department stayed involved and something went wrong, your department would get blamed and that my office was in collusion with the Johnson City Police Department.

Billy Church, Chief
Johnson City Police Department
June 27, 2023
Page Two

We discussed that my office would continue to actively work on all other cases with the Johnson City Police Department as we have been since the beginning of my tenure. We both agreed that it is about getting justice for the victims, and this is how I was going to do it.

This letter is not a slight on the police department and the great work you are doing. It is to avoid any conflict and/or any appearance of impropriety on any entity's part. Therefore, my decision is that my office along with assistance from the TBI will take over this investigation and further prosecution.

Sincerely,



Steven R. Finney
District Attorney General

SRF/kh

From: "Ball, Cathy" <cball@johnsoncitytn.org>

To: "srfinney" [REDACTED]

Cc: "Church, Bill" <bchurch@johnsoncitytn.org>

Subject: FW: Does Filing re: MOTION to Amend/Revise [21] Amended Complaint - Documents attached

Date: Wed, 13 Dec 2023 14:44:29 +0000

Importance: Normal

Attachments: DOC._93_MOTION_to_Amend-Revise_[21]_Amended_Complaint_field_12-12-23.pdf;
DOC._93-1_MOTION_to_Amend-Revise_[21]_Amended_Complaint_field_12-12-23.pdf

Inline-Images: image002.jpg

General Finney,

This is the motion that was filed yesterday by the plaintiffs in the Doe case.

Cathy

From: Baker, Joy <jbaker@johnsoncitytn.org>

Sent: Wednesday, December 13, 2023 8:36 AM

To: Ball, Cathy <cball@johnsoncitytn.org>; Sandos, Sunny <ssandos@johnsoncitytn.org>; Watson, Blake <bwatson@johnsoncitytn.org>

Subject: Does Filing re: MOTION to Amend/Revise [21] Amended Complaint - Documents attached

From: Lisa May <lisa@hbm-lawfirm.com>

Sent: Wednesday, December 13, 2023 8:28 AM

To: Baker, Joy <jbaker@johnsoncitytn.org>

Subject: [EXTERNAL] Does Filing re: MOTION to Amend/Revise [21] Amended Complaint

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Joy:

Please see attached *MOTION to Amend/Revise [21] Amended Complaint* that was filed on 12/12/23 at 9:42 PM.

Thanks,

Lisa

Lisa May

Legal Assistant to Erick Herrin

HERRIN, McPEAK & ASSOCIATES

P.O. Box 629

515 E. Unaka Avenue

Johnson City, TN 37605-0629

P: 423.929.7113 | F: 423.929.7114

E: lisa@hbm-lawfirm.com



**HERRIN, McPEAK
& ASSOCIATES**

Attorneys at Law

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From: "Ball, Cathy" <cball@johnsoncitytn.org>

To: [REDACTED]

Cc: "Church, Bill" <bchurch@johnsoncitytn.org>, "Jenkins, Scott" <sjenkins@johnsoncitytn.org>, "Dougherty, Eric" <edougherty@johnsoncitytn.org>

Subject: FW: [EXTERNAL] NEW LAWSUIT

Date: Thu, 22 Jun 2023 00:50:06 +0000

Importance: Normal

Attachments: COMPLAINT_DOC_1_FILED_6-21-23.pdf; COMPLAINT_FILED_DOC_1-1_FILED_6-21-23.pdf; MEMO_IN_SUPPORT_OF_MOTION_TO_PROCEED_UNDER_PSEUDONYM_DOC_3_FILED_6-21-23.pdf; MOTION_TO_FILE_UNDER_PSEUDONYM_DOC_2_FILED_6-21-23.pdf; SWORN_DECLARATION_OF_HEATHER_MORE_COLLINS_DOC_2-1_FILED_6-21-23.pdf

Inline-Images: image001.jpg; image002.jpg

General Finney,

Thank you for your time this afternoon on the phone. The lawsuit we referenced in our conversation has been filed. I am providing you a copy for your information.

Again, thank you so much for the continued partnership with the JCPD.

Cathy

From: Keenan, Sheri <skeenan@johnsoncitytn.org>

Sent: Wednesday, June 21, 2023 6:20 PM

To: Trivette, Randy <rtrivette@johnsoncitytn.org>; Ball, Cathy <cball@johnsoncitytn.org>

Subject: FW: [EXTERNAL] NEW LAWSUIT



Sheri Keenan

Paralegal, Legal Department

City of Johnson City, Tennessee

423.434.6009 o. / 423.444.6760 c. / www.johnsoncitytn.org

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From: Lisa May <lisa@hbm-lawfirm.com>

Sent: Wednesday, June 21, 2023 6:19 PM

To: Keenan, Sheri <skeenan@johnsoncitytn.org>

Subject: [EXTERNAL] NEW LAWSUIT

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Lisa

Lisa May
Legal Assistant to Erick Herrin
HERRIN, McPEAK & ASSOCIATES
P.O. Box 629
515 E. Unaka Avenue
Johnson City, TN 37605-0629
P: 423.929.7113 | F: 423.929.7114
E: lisa@hbm-lawfirm.com



**HERRIN, McPEAK
& ASSOCIATES**

Attorneys at Law

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IRS CIRCULAR 230 DISCLOSURE: IRS Circular 230 requires us to state that, unless it is expressly stated above or in an attachment hereto, any opinions expressed with respect to a significant tax issue are not intended or written by us to be used, and cannot be used by the recipient, for the purpose of avoiding penalties that may be imposed on the recipient or any other person who may examine this correspondence in connection with a Federal tax matter.

From: "Ball, Cathy" <cball@johnsoncitytn.org>

To: "Wise, Joe" <jwise@johnsoncitytn.org>

Subject: FW: [EXTERNAL] Sean Williams Investigation

Date: Tue, 27 Jun 2023 20:39:01 +0000

Importance: Normal

Attachments: Letter_to_JCPD_Chief_Church_(06-27-23).pdf

From: Kimberly A. Hagy [REDACTED]

Sent: Tuesday, June 27, 2023 3:43 PM

To: Church, Bill <bchurch@johnsoncitytn.org>

Cc: Ball, Cathy <cball@johnsoncitytn.org>; christopher.wilhoit@tn.gov

Subject: [EXTERNAL] Sean Williams Investigation

****CAUTION: External Email**** This email originated from outside of Johnson City's e-mail servers. DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Chief Church,

Please see the attached letter from General Finney regarding the Sean Williams' investigation. At General Finney's request, I am also providing a copy of this letter to Ms. Ball and Agent Wilhoit. Should you have any questions, please feel free to contact General Finney.

Thank you,
Kim Hagy

Kim Hagy

Legal Secretary

District Attorney General's Office 1st Judicial District

115 East Jackson Boulevard

P. O. Box 38

Jonesborough, TN 37659

[REDACTED]

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Reply to:

☒ Washington County Office
Washington County Courthouse
P.O. Box 38
Jonesborough, TN 37659
Phone: (423) 753-5020
Fax: (423) 753-4803

☐ Carter County Office
1500 West Elk Avenue, Suite 208
Elizabethton, TN 37643
Phone: (423) 547-5897
Fax: (423) 547-5896



STEVEN R. FINNEY
DISTRICT ATTORNEY GENERAL
FIRST JUDICIAL DISTRICT

☐ Unicoi County Office
Unicoi County Courthouse
100 N. Main Street
P.O. Box 730
Erwin, TN 37650
Phone: (423) 743-1113
Fax: (423) 743-1120

☐ Johnson County Office
301 West Main Street
Mountain City, TN 37683
Phone: (423) 727-3959
Fax: (423) 727-3965

June 27, 2023

VIA ELECTRONIC MAIL

Mr. Billy Church, Chief
Johnson City Police Department
601 East Main Street
Johnson City, TN 37601

RE: Investigation of Sean Williams

Dear Chief Church:

On June 2, 2023, I along with Abby Wallace, Assistant District Attorney, and Mike Little, D.A. Investigator, met with you, Eric Dougherty, Mike Adams, Cathy Ball, City Manager, and discussed the Williams' Investigation as to new evidence that was discovered as a result of the North Carolina investigation. Without going into detail, we described the magnitude of the situation. The crux of the conversation was that we wished to have a female investigator assist my office in interviews with potential victims if we could get them to come forward.

Since that time, there has been a second lawsuit filed naming more members of the Johnson City Police Department as "John Doe" defendants. As a result, I called you on June 23, 2023 and informed you that my office would be taking over the state investigation and using a TBI female agent to work with Mike Little in interviewing female victims and witnesses. I further informed you that this was my decision not to use the Johnson City Police Department to protect the sanctity of the investigation and prosecution. I explained that if the Johnson City Police Department stayed involved and something went wrong, your department would get blamed and that my office was in collusion with the Johnson City Police Department.

Billy Church, Chief
Johnson City Police Department
June 27, 2023
Page Two

We discussed that my office would continue to actively work on all other cases with the Johnson City Police Department as we have been since the beginning of my tenure. We both agreed that it is about getting justice for the victims, and this is how I was going to do it.

This letter is not a slight on the police department and the great work you are doing. It is to avoid any conflict and/or any appearance of impropriety on any entity's part. Therefore, my decision is that my office along with assistance from the TBI will take over this investigation and further prosecution.

Sincerely,



Steven R. Finney
District Attorney General

SRF/kh

From: "Ball, Cathy" <cball@johnsoncitytn.org>

To: "Dougherty, Eric" <edougherty@johnsoncitytn.org>

Subject: Fwd: [EXTERNAL] URGENT REQUEST

Date: Thu, 01 Jun 2023 17:00:15 +0000

Importance: Normal

Begin forwarded message:

From: "Chrystie L. Kyte" [REDACTED]

Date: June 1, 2023 at 11:44:13 AM EDT

To: "Church, Bill" <bchurch@johnsoncitytn.org>, City Manager <citymgr@johnsoncitytn.org>

Subject: [EXTERNAL] URGENT REQUEST

****CAUTION: External Email**** This email originated from outside of Johnson City's e-mail servers. DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

General Finney has requested a meeting at the Johnson City Police Department with each of you tomorrow, Friday, June 2, 2023, at 1:30pm. This concerns the matter involving Sean Williams and General Finney needs to meet with you as soon as possible. Please respond at your earliest convenience to confirm that you are available. Thank you!

Chrystie Kyte

Administrative Assistant

First Judicial District Attorney General's Office

P.O. Box 38

Jonesborough, TN 37659

[REDACTED]

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From: "Ball, Cathy" <cball@johnsoncitytn.org>

To: "Chrystie L. Kyte" [REDACTED]

Subject: Fwd: Press Release and Cover Letter for Daigle Audit

Date: Tue, 18 Jul 2023 13:32:21 +0000

Importance: Normal

Attachments: Audit_letter_Cathy_Ball.docx; AuditReport_(002).docx

Inline-Images: image002.png

Christie,

I am not sure if the General is in the office. We had hoped to get his review of these documents prior to them going out. We had hope to send out in the next 30 min.

Thanks,
Cathy

Begin forwarded message:

From: "Ball, Cathy" <cball@johnsoncitytn.org>

Date: July 18, 2023 at 7:15:00 AM EDT

To: "Steve Finney" [REDACTED]

Cc: "Church, Bill" <bchurch@johnsoncitytn.org>, "Jenkins, Scott" <sjenkins@johnsoncitytn.org>, "Dougherty, Eric" <edougherty@johnsoncitytn.org>, "Carrier, Scott" <scarrier@johnsoncitytn.org>, "Shoun, Keisha" <kshoun@johnsoncitytn.org>

Subject: Press Release and Cover Letter for Daigle Audit

General,

Good morning. We are planning to release the attached press release and cover letter for the Daigle Audit this morning. Do you mind reviewing these prior to their release?

Thanks so much for your help. I hope you have a great day.

Cathy



Cathy D. Ball

City Manager

City of Johnson City, Tennessee

423.434.6001 o. / 423.431.9459 c. / www.johnsoncitytn.org



Communications and Marketing
601 E. Main St. Johnson City, TN 37601
CoJCNews@JohnsonCityTN.org
423.434.6021

July 18, 2023
For immediate release

CONTACT: Cathy Ball, city manager
423.434.6002

Audit report of sexual assault investigations details 8 key findings

The City of Johnson City on Tuesday released its Audit of Sex-Related Crimes, a 45-page review of 325 sexual assault-related investigations conducted by the Daigle Law Group (DLG). The firm was contracted by the City after hearing concerns from residents in the summer of 2022.

DLG, an independent third party and national expert, spent months researching the Johnson City Police Department's (JCPD) investigations of cases that took place between January 2018 and December 2022. The audit, which was specific to the processes and procedures used in investigations of this nature, included file review, interviews of personnel, and input from the community.

"We first want to acknowledge that victims of sexual assault have not always received the best possible treatment and care from our police department," said City Manager Cathy Ball. "The department's new leadership team is dedicated to continued changes toward compassionate and effective service so that all citizens know they are safe and protected."

The eight findings from the report are as follows:

Finding No. 1: The Records Management System and records process at JCPD is inadequate to support the effective operation of the Department.

Finding No. 2: The sexual assault investigations conducted by JCPD have material deficiencies that can hinder the ability to collect necessary evidence for a complete and accurate investigation.

Finding No. 3: JCPD's investigations were found to be inconsistent, ineffective, and incomplete.

Finding No. 4: JCPD process of closing investigations is flawed and inaccurate.

Finding No. 5: JCPD needs to ensure that all complaints of misconduct against the Department, including anonymous complaints, are timely investigated.

Finding No. 6: Supervision was insufficient to ensure full, fair and complete investigations.

Finding No. 7: Department policies and procedures do not meet industry standards and legal requirements to investigate sexual assault investigations.

Finding No. 8: Department training is insufficient to effectively conduct unbiased sexual assault and related investigations.

While awaiting the audit report, Johnson City prioritized this issue and changed how JCPD approaches sexual assault cases. City management met regularly with the firm's principal, Eric Daigle, throughout the process to learn what improvements could be made - along with what investments should be prioritized in the FY24 budget - so that action could be taken prior to the completion of the audit.

Steps implemented include:

1. Full implementation of, and training on, the District Attorney's new sexual assault investigation protocol, which has changed our criminal justice system significantly, making it better equipped to deliver justice for victims
2. Complete review of investigative policies and procedures
3. Creation of a comfortable space for use by victims as interviews are conducted
4. An additional \$100,000 invested for training to ensure police officers are knowledgeable and understanding of the unique nature of sexual assault cases
5. \$50,000 allocated for a new records management system that will help ensure that all cases are handled efficiently and expediently
6. Assessment of additional staffing needs

"We believe these steps to be significant, but only the beginning. We commit to demonstrating improvements in the areas where we have fallen short," Ball said.

Ball will make a formal report on the audit to the Board of Commissioners at its July 20 meeting. While not standard practice, the community is invited to offer public comment following the presentation.

"Anyone who wishes to do so will have the opportunity for their voice to be heard," Ball said.

Feedback on the report also is welcomed via email to citymgr@johnsoncitytn.org.

###

**Office of the City Manager**

City of Johnson City

601 E. Main St.

Johnson City, TN 37601

citymgr@johnsoncitytn.org

423.424.6003 | JohnsonCityTN.org

July 18, 2023

Dear Community Member,

After hearing concerns from residents in the summer of 2022, City administration determined that it must improve how the Johnson City Police Department (JCPD) handles sexual assault cases.

In August 2022, the City sought the assistance of the Daigle Law Group, an independent third party and national expert, to review the department's processes and procedures specific to sexual assault investigations spanning the period of January 2018 to December 2022. The review included the opportunity for community members to submit their concerns regarding how JCPD handles sexual assault cases directly to the Daigle firm.

What follows this letter is Johnson City's *Audit of Sex-Related Crimes*, by the Daigle Law Group, which details eight key findings and presents recommendations for remediation.

On behalf of City administration and the police command staff, we acknowledge that victims of sexual assault have not always received the best possible treatment and care from our police department. The department's new leadership team is dedicated to continued changes toward compassionate and effective service so that all citizens know they are safe and protected.

While awaiting the audit report, Johnson City prioritized this issue and changed how JCPD approaches sexual assault cases. City management met regularly with Mr. Daigle to learn what improvements could be made - along with what investments should be prioritized in the FY24 budget - so that action could be taken prior to the completion of the audit.

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6. Assessment of additional staffing needs

We believe these steps to be significant, but only the beginning. We commit to demonstrating improvements in the areas where we have fallen short. We will report our progress to the Board of Commissioners in six months.

Feedback on this report is welcomed and may be directed to: citymgr@johnsoncitytn.org.

Sincerely,

Cathy D. Ball, city manager
City of Johnson City

Kent Herrin (1919 – 1994)

K. Erickson Herrin
Samuel K. McPeak
Hunter S. Shepard



**HERRIN, McPEAK
& ASSOCIATES**

Attorneys at Law

515 East Unaka Avenue
P.O. Box 629
Johnson City, TN 37605-0629
Phone: (423) 929-7113
Fax: (423) 929-7114

September 1, 2023

Sent Via USPS Certified Mail

Vanessa Baehr-Jones
Advocates for Survivors of Abuse
4200 Park Boulevard No. 413
Oakland, California 94602
vanessa@advocatesforsurvivors.com

Re: Sean Williams Criminal Investigations

Ms. Baehr-Jones:

As counsel to the City of Johnson City in the lawsuit you filed styled *Jane Does, et al. v. City of Johnson City, et al* I have been forwarded your correspondence to Bill Church, Johnson City's Chief of Police.

To avoid any possible appearance of impropriety the District Attorney's Office is handling the investigations involving Sean Williams without the involvement of Detective Sparks or any other member of the Johnson City Police Department. This decision was made on June 23, 2023. [It is possible Investigator Sparks made a case note entry or two into those files shortly after June 23rd simply to reflect his transfer of evidence or other comments necessary to his withdrawal from further participation.]

Since the City of Johnson City is a named party in the litigation you have initiated please direct all correspondence related to this litigation to me or Sunny Sandos, City Attorney and not to any City employee or representative directly.

Sincerely,

K. Erickson Herrin, BPR # 012110

HERRIN, McPEAK & ASSOCIATES

515 East Unaka Avenue
P. O. Box 629
Johnson City, TN 37605-0629
Phone: (423) 929-7113
Email: lisa@hbm-lawfirm.com

KEH/mlm

cc: Steve Finney, District Attorney (via email)

From: "Ball, Cathy" <cball@johnsoncitytn.org>

To: [REDACTED]

Cc: "Church, Bill" <bchurch@johnsoncitytn.org>, "Jenkins, Scott" <sjenkins@johnsoncitytn.org>, "Dougherty, Eric" <edougherty@johnsoncitytn.org>, "Shoun, Keisha" <kshoun@johnsoncitytn.org>

Subject: Media Heads Up

Date: Thu, 22 Jun 2023 18:05:04 +0000

Importance: Normal

Attachments: Media_Briefing_6_22_23.docx

General Finney,

We are giving a media briefing at 3:00 PM today. I wanted to provide you with a copy of what I am planning to say. Please let me know if you have any questions.

My best,
Cathy

The City of Johnson City was made aware of a civil suit filed in Greeneville yesterday. We have not yet been formally served with this lawsuit. The claims made in this lawsuit will be addressed - and the facts will be presented - in civil court.

These allegations are not new. After they were first made a year ago, we heard from citizens who expressed concern about how our police department investigated sexual assaults. We took those concerns seriously and immediately hired a national expert, independent third-party law firm to review our processes and procedures.

We are expecting the final report from the Daigle Law Group in the next couple of weeks but we've had regular conversations with Mr. Daigle to begin understanding what we could be working on now and ensure those investments are made in the FY 2024 budget.

Additionally, upon taking office in fall 2022, General Finney provided a protocol to guide investigators throughout the First Judicial District in sexual assault cases. We are proud to partner with him to bring offenders to justice.

I have every confidence in the men and women of the Johnson City Police Department, in their integrity and the work they do. I assure you, these officers are diligent in ensuring the rights of victims are respected and those efforts are supported by this command staff.

We understand that individuals do not choose to become victims, and we know that it's difficult to discuss traumatic events. However, we encourage victims to report these crimes so that offenders may be brought to justice and we will continue to work hand in hand with the District Attorney's office to do so.

From: "Ball, Cathy" <cball@johnsoncitytn.org>

To: "Steve Finney" [REDACTED]

Cc: "Church, Bill" <bchurch@johnsoncitytn.org>, "Jenkins, Scott" <sjenkins@johnsoncitytn.org>, "Dougherty, Eric" <edougherty@johnsoncitytn.org>, "Carrier, Scott" <scarrier@johnsoncitytn.org>, "Shoun, Keisha" <kshoun@johnsoncitytn.org>

Subject: Press Release and Cover Letter for Daigle Audit

Date: Tue, 18 Jul 2023 11:15:27 +0000

Importance: Normal

Attachments: Audit_letter_Cathy_Ball.docx; AuditReport_(002).docx

Inline-Images: image002.png

General,

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Thanks so much for your help. I hope you have a great day.

Cathy



Cathy D. Ball

City Manager

City of Johnson City, Tennessee

423.434.6001 o. / 423.431.9459 c. / www.johnsoncitytn.org



Communications and Marketing
601 E. Main St. Johnson City, TN 37601
CoJCNews@JohnsonCityTN.org
423.434.6021

July 18, 2023
For immediate release

CONTACT: Cathy Ball, city manager
423.434.6002

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"We believe these steps to be significant, but only the beginning. We commit to demonstrating improvements in the areas where we have fallen short," Ball said.

Ball will make a formal report on the audit to the Board of Commissioners at its July 20 meeting. While not standard practice, the community is invited to offer public comment following the presentation.

"Anyone who wishes to do so will have the opportunity for their voice to be heard," Ball said.

Feedback on the report also is welcomed via email to citymgr@johnsoncitytn.org.

###

**Office of the City Manager**

City of Johnson City

601 E. Main St.

Johnson City, TN 37601

citymgr@johnsoncitytn.org

423.424.6003 | JohnsonCityTN.org

July 18, 2023

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Feedback on this report is welcomed and may be directed to: citymgr@johnsoncitytn.org.

Sincerely,

Cathy D. Ball, city manager
City of Johnson City

From: "Chrystie L. Kyte" [REDACTED]

To: "Ball, Cathy" <cball@johnsoncitytn.org>

Subject: RE: [EXTERNAL] RE: Media Heads Up

Date: Thu, 22 Jun 2023 18:51:10 +0000

Importance: High

Thank you!!

Chrystie Kyte
Administrative Assistant
First Judicial District Attorney General's Office
P.O. Box 38
Jonesborough, TN 37659
[REDACTED]

From: Ball, Cathy <cball@johnsoncitytn.org>

Sent: Thursday, June 22, 2023 2:47 PM

To: Chrystie L. Kyte [REDACTED]; Steven R. Finney [REDACTED]

Cc: Church, Bill <bchurch@johnsoncitytn.org>; Jenkins, Scott <sjenkins@johnsoncitytn.org>; Dougherty, Eric <edougherty@johnsoncitytn.org>; Shoun, Keisha <kshoun@johnsoncitytn.org>

Subject: RE: [EXTERNAL] RE: Media Heads Up

Thanks so much. We have removed the requested portion from the statement.

From: Chrystie L. Kyte [REDACTED]

Sent: Thursday, June 22, 2023 2:33 PM

To: Ball, Cathy <cball@johnsoncitytn.org>; Steven R. Finney [REDACTED]

Cc: Church, Bill <bchurch@johnsoncitytn.org>; Jenkins, Scott <sjenkins@johnsoncitytn.org>; Dougherty, Eric <edougherty@johnsoncitytn.org>; Shoun, Keisha <kshoun@johnsoncitytn.org>

Subject: [EXTERNAL] RE: Media Heads Up

****CAUTION: External Email**** This email originated from outside of Johnson City's e-mail servers. DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Ms. Ball,

General Finney's response concerning your media release, "Because this release directly pertains to the pending lawsuit, the line from your statement of "and we will continue to work hand in hand with the District Attorney's office to do so," needs to be omitted from your statement.

Please let me know if you have any questions. Thank you.

Chrystie Kyte
Administrative Assistant
First Judicial District Attorney General's Office
P.O. Box 38
Jonesborough, TN 37659
[REDACTED]

From: Ball, Cathy <cball@johnsoncitytn.org>
Sent: Thursday, June 22, 2023 2:05 PM
To: Steven R. Finney [REDACTED]
Cc: Church, Bill <bchurch@johnsoncitytn.org>; Jenkins, Scott <sjenkins@johnsoncitytn.org>; Dougherty, Eric <edougherty@johnsoncitytn.org>; Shoun, Keisha <kshoun@johnsoncitytn.org>
Subject: Media Heads Up

General Finney,

We are giving a media briefing at 3:00 PM today. I wanted to provide you with a copy of what I am planning to say. Please let me know if you have any questions.

My best,
Cathy

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From: "Ball, Cathy" <cball@johnsoncitytn.org>

To: "Chrystie L. Kyte" [REDACTED]

Cc: "Church, Bill" <bchurch@johnsoncitytn.org>, City Manager <citymgr@johnsoncitytn.org>, "Dougherty, Eric" <edougherty@johnsoncitytn.org>, "Jenkins, Scott" <sjenkins@johnsoncitytn.org>

Subject: Re: [EXTERNAL] URGENT REQUEST

Date: Thu, 01 Jun 2023 17:06:03 +0000

Importance: Normal

Ms. Kyle,

Please tell the General that we will be available at this time. I will reserve a conference room for us to meet.

Thank you,
Cathy

On Jun 1, 2023, at 11:44 AM, Chrystie L. Kyte [REDACTED] wrote:

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General Finney has requested a meeting at the Johnson City Police Department with each of you tomorrow, Friday, June 2, 2023, at 1:30pm. This concerns the matter involving Sean Williams and General Finney needs to meet with you as soon as possible. Please respond at your earliest convenience to confirm that you are available. Thank you!

Chrystie Kyte
Administrative Assistant
First Judicial District Attorney General's Office
P.O. Box 38
Jonesborough, TN 37659
[REDACTED]

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From: "Ball, Cathy" <cball@johnsoncitytn.org>

To: "srfinney" [REDACTED]

Cc: "Church, Bill" <bchurch@johnsoncitytn.org>, "Dougherty, Eric" <edougherty@johnsoncitytn.org>, "Watson, Blake" <bwatson@johnsoncitytn.org>

Subject: FW: [EXTERNAL] Does Proposed Amended Complaint

Date: Mon, 11 Dec 2023 23:08:34 +0000

Importance: Normal

Embedded: unnamed

Inline-Images: image002.jpg

General,

I appreciate the conversation today. I have attach the second amended complaint from the Doe case. The part I referenced on our phone call starts on page 37.

This is supposed to be filed by the plaintiff on Wednesday so there may be some changes.

Please let me know if you have any questions.

Cathy

From: Lisa May <lisa@hbm-lawfirm.com>

Sent: Saturday, December 9, 2023 3:21 PM

To: Ball, Cathy <cball@johnsoncitytn.org>; Baker, Joy <jbaker@johnsoncitytn.org>

Subject: [EXTERNAL] Does Proposed Amended Complaint

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Cathy and Joy:

Attorney – Client Privilege

Attorney – Client Privilege

Erick H.

Lisa

Lisa May
Legal Assistant to Erick Herrin
HERRIN, McPEAK & ASSOCIATES
P.O. Box 629
515 E. Unaka Avenue
Johnson City, TN 37605-0629
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**HERRIN, McPEAK
& ASSOCIATES**

Attorneys at Law

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From: Kevin Osborne <kevin@eko.law>

To: Emily Taylor <etaylor@watsonroach.com>, Lisa May <lisa@hbm-lawfirm.com>, "awells@rswlaw.com" <awells@rswlaw.com>, "kgrant@rswlaw.com" <kgrant@rswlaw.com>, "danny@moorerader.com" <danny@moorerader.com>, "lrufolo@rswlaw.com" <lrufolo@rswlaw.com>, "mashburn@watsonroach.com" <mashburn@watsonroach.com>, "andre@moorerader.com" <andre@moorerader.com>, "kberexa@fbb.law" <kberexa@fbb.law>, "Ben C. Allen" <ballen@fbb.law>, "rspaulding@watsonroach.com" <rspaulding@watsonroach.com>

Cc: Elizabeth Kramer <elizabeth@eko.law>, Vanessa Baehr-Jones <vanessa@advocatesforsurvivors.com>, Heather Collins <heather@hmccivilrights.com>

Subject: Does v. City of Johnson City, et al. - Amended Complaint

Date: Fri, 08 Dec 2023 07:53:57 +0000

Importance: Normal

Attachments: Second_Am._Class_Complaint.pdf; Ex_1.pdf

Inline-Images: EK+O_Sig.png

Counsel,

Please find attached plaintiffs' amended complaint and exhibit 1 thereto.

Regards,
Kevin

KEVIN M. OSBORNE
ERICKSON KRAMER OSBORNE
San Francisco, California
Direct: 415.539.9202
www.eko.law



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